

ACCELERATION OF DTV RECEPTION CAPABILITY IN PERIPHERAL TV EQUIPMENT SUCH AS DVD RECORDERS IS NOT WARRANTED BECAUSE OF THE STATE OF TECHNOLOGY AND BECAUSE IT WOULD HAVE VIRTUALLY NO IMPACT ON THE DTV TRANSITION

Maintaining the Current July 1, 2007 DTV Tuner Date for Peripheral TV Devices Is Appropriate In Light of Technological Limitations.

- Thomson manufactures DVD recorders and combination DVD player/VCRs. The state of technology, however, has not yet advanced to high definition television programming recording because of uncertainty surrounding a high definition disc format. Such uncertainty is expected to persist for a year or more.
- From a technology perspective, it makes no sense to mandate DTV reception capability in equipment that does not yet have underlying high definition television programming recording capability.
- As Panasonic noted in its Reply Comments, the July 1, 2007 date for integration of DTV reception capability in these peripheral DTV products is most consistent with producing and selling high quality and affordable next generation HDTV recording products.

Acceleration of the July 1, 2007 Date For Peripheral Products Will Not Adversely Affect the DTV Transition.

- Peripheral TV products, such as digital video recorders and DVD recorders, also are peripheral to the DTV transition. The primary focus is on digital television sets.
- The importance of peripheral products to the DTV transition is reduced even further because more than 85 percent of American TV households receive their television from cable or satellite.
- Acceleration of the deadline to no later than December 31, 2006 for such peripheral devices would force the market toward production of tunerless recording devices, relying on a cable or satellite set top box to feed the signal.

Acceleration of the DTV Tuner Mandate In Peripheral TV Products To A Date No Later Than December 31, 2006 Is Inconsistent With Retailers 'Practices

- The focus of retailers during the Winter holiday season is selling products.
- It is completely at odds with customary retailing practices to establish a DTV reception integration deadline that will have the effect of causing retailers to reset their floors during the holidays.